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June 21, 2022

Via ECF

The Honorable Gabriel W. Gorenstein
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: *Schansman et al v. Sberbank of Russia PJSC et al.*, 19-cv-02985-ALC-GWG
Response in Compliance with Order Dated June 21, 2022 (ECF 364)**

Dear Judge Gorenstein:

We apologize for the confusion caused by the wording at the conclusion of our letter of June 16, 2022 (ECF 362). We had understood paragraph 2.A of the Court's Individual Practices to leave open the possibility that the Court might order formal briefing even if neither party requested it. To that end, our intention was to indicate that if the Court were to grant Plaintiffs' request "to move to compel" (ECF 357 at 9), and not decide the underlying dispute based on the parties' letters, MoneyGram was prepared to respond with a formal memorandum and supporting declarations. We were not requesting formal briefing if the Court were inclined to decide the underlying dispute in Plaintiffs' favor, which as the Court correctly notes is both illogical and contrary to the Court's Individual Practices.

To be clear, we do not believe that formal briefing is necessary.

Respectfully submitted,

/s/ Christopher N. Manning
Christopher N. Manning

Counsel for the MoneyGram Defendants

cc: Counsel of Record (via ECF)